

NOTICE OF VIOLATION

Georgia Power Company
Hatch Nuclear Plant Units 1 and 2

Docket Nos. 50-321 and 50-366
License Nos. DPR-57 and NPF-7
EA 96-452

During an NRC inspection conducted on October 21 through 25, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (NUREG 1600), the violations are listed below:

- A. 10 CFR 50.65 (b) establishes the scoping criteria for selection of safety related and non-safety related structures, systems, or components to be included within the Maintenance Rule program. Scoping criteria shall include, in part, non-safety related structures, systems, or components that are relied upon to mitigate accidents or transients, or are used in the plant emergency operating procedures, or whose failure could prevent safety-related structures, systems, and components from fulfilling their safety-related function, or whose failure could cause a reactor scram or actuation of a safety-related system.

Hatch Nuclear Plant Administrative Procedure, 40AC-ENG-020-0S, MAINTENANCE RULE (10 CFR 50.65) IMPLEMENTATION AND COMPLIANCE, Revision 1, and the HATCH NUCLEAR PLANT 10 CFR 50.65 MAINTENANCE RULE SCOPING MANUAL, Revision 1, implemented the requirements of 10 CFR 50.65 and identified those systems and components included within the scope of the Maintenance Rule.

Contrary to the above,

As of October 25, 1996, the licensee failed to include a number of nonsafety-related systems or components within the scope of the Maintenance Rule as required. Specifically, the following systems should have been included within the scope of the Maintenance Rule, but were not.

1. Communications System, Emergency Lighting System, and Appendix R Emergency Lighting System - These non-safety related systems were not included in the scope of the Maintenance Rule even though they are relied upon to mitigate accidents or transients.
2. Cooling Towers System - This non-safety related system was not included in the scope of the Maintenance Rule even though the system experienced a failure on March 24, 1995, which could have caused a Unit 2 reactor scram and actuation of a safety-related system; and experienced a similar failure on September 1, 1995, which resulted in a Unit 2 reactor scram and actuation of a safety-related system.

This is a Severity Level IV violation (Supplement I)

ENCLOSURE 1

- B. 10 CFR 50.65 (a)(1) requires, in part, that each holder of an operating license shall monitor the performance or condition of structures, systems, or components against licensee established goals. Such goals shall be established commensurate with safety.

Contrary to the above,

As of October 25, 1996, the licensee failed to establish reliability and/or availability goals or performance criteria commensurate with safety for risk significant structures, systems or components for the following systems:

- Primary Containment System
- Feed and Condensate System
- Circulating Water System
- Electro-hydraulic Control System
- Unit 2 Containment Chilled Water System
- AC Electrical System
- DC Electrical System
- Primary Containment Isolation System
- Analog Transmitter Trip System

For these systems the licensee either failed to establish performance criteria, or established performance criteria that would not satisfactorily monitor system performance.

This is a Severity Level IV violation (Supplement 1)

- C. 10 CFR 50.65 (a)(1) requires, in part, that holders of an operating license shall monitor the performance or condition of structures, systems, or components, against licensee-established goals, in a manner sufficient to provide reasonable assurance that such structures, systems, and components, within the scope of the Maintenance Rule, are capable of fulfilling their intended functions. When the performance or condition of a structure, system, or component does not meet established goals, appropriate corrective action shall be taken. 10 CFR 50.65 (a)(2) requires, in part, that monitoring as specified in paragraph (a)(1) is not required where it has been demonstrated that the performance or condition of a structure, system, or component is being effectively controlled through the performance of appropriate preventative maintenance, such that the structure, system, or component remains capable of performing its intended function.

Hatch Nuclear Plant Administrative Control Procedure, 40AC-ENG-020-0S, MAINTENANCE RULE (10 CFR 50.65) IMPLEMENTATION AND COMPLIANCE, Revision 1, established procedures for implementation of the requirements of 10 CFR 50.65 (a)(1) and (a)(2).

40AC-ENG-020-0S, paragraph 8.6.3 requires, in part, the system engineer to perform a cause determination, evaluate generic common cause implications, include events impact on performance criteria, document the event using the deficiency process, and implement additional monitoring, surveillance or preventative maintenance tasks, as required, when an event occurs which impacts system/function performance criteria. Paragraph 8.7.1 requires, in part, establishment of goals when performance criteria is not met or a repetitive maintenance preventable functional failure occurs.

Contrary to the above,

Between July 10 and October 2, 1996, the licensee failed to follow the requirements of 40AC-ENG-020-0S, paragraphs 8.6.3 and 8.7.1, for three maintenance preventable functional failures which occurred on the Unit 1 Traveling Screen\Trash Rake System during the period October 1995 - January 1996, resulting in failure to implement the requirements of 10 CFR 50.65 (a)(1) and (a)(2) of the Maintenance Rule..

This is a Severity Level IV violation (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, Georgia Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without reduction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated in Atlanta, Georgia
this day of November 1996

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